

UNITED STATES DISTRICT COURT
for the
Western District of Texas

FILED
April 29, 2025
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: vp DEPUTY

United States of America)
v.)
ZAID MASHHOUR HADDAD) Case No. SA-25-MJ-668
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)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 14, 2021 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 USC 2256(8)(A)
Title 18 USC 2252A(a)(5)(B)

Knowingly Accessed with Intent to View, Any Material that Contained
an Image of Child Pornography; Possession of Child Pornography

Penalties: 20 Years Imprisonment, Lifetime Supervised Release, Up to
\$250,000 Fine, \$100 Special Assessment, \$5,000 JVTA, Up to \$17,000
AVAA, Restitution, Forfeiture, and Registration as a Sex Offender

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

MACKENZIE
FERGUSON

Digitally signed by MACKENZIE
FERGUSON
Date: 2025.04.28 13:16:30 -05'00'

Complainant's signature

Mackenzie D. Ferguson, FBI Special Agent

Printed name and title

RFB

Judge's signature

Date: April 29, 2025

City and state: San Antonio, Texas

RICHARD B. FARRER, US MAGISTRATE JUDGE

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Mackenzie D. Ferguson, being duly sworn, depose and state that:

1. I am a Special Agent with the Federal Bureau of Investigation and have been employed by the FBI since June 2010. I served as an FBI Intelligence Analyst from June 2010 through June 2021, first assigned to support investigations into child exploitation matters in 2015. I am currently assigned to the Crimes Against Children Task Force in the FBI San Antonio Field Division. I have received particularized training in the investigation of computer-related crimes, child abductions, online enticement, online threatening communications, peer-to-peer computer networking, and online (i.e. Internet based) crimes against children. I have conducted and been involved in numerous investigations of individuals suspected of utilizing Internet devices to further criminal activity and have participated in the execution of numerous search warrants which have resulted in the seizure of digital evidence. I have had the occasion to become directly involved in investigations relating to missing or kidnapped children and am familiar with the investigative techniques commonly used to collect evidence in such cases.
2. This affidavit is being submitted in support of an Application for a Criminal Complaint for Zaid Mashhour HADDAD.
3. On July 14, 2021, a federal search warrant was executed at HADDAD's apartment in San Antonio, Texas. HADDAD was in the bedroom of the apartment viewing child sexual abuse material being streamed from his computer to a TV mounted on the bedroom wall.

HADDAD used a VPN to connect to the Firefox browser to stream a MEGA.nz link from his computer to the TV mounted on the wall of his bedroom.

4. The FBI search team reviewed and documented the contents of the MEGA.nz link that was being displayed on HADDAD's television. Several videos depicting child pornography were observed, including the video that was being played on the TV from the computer when the FBI entered the apartment. This video depicts a prepubescent male child laying on his back with his genitals and anus exposed toward the camera. A nude male can be seen repeatedly inserting his erect penis into the anus of the prepubescent male. The child depicted in the video appeared to be seven (7) or eight (8) years old.
5. The investigation showed HADDAD received MEGA links containing child sexual abuse material from direct message threads on Telegram. The links HADDAD received were stored within his Telegram application. HADDAD explained to federal agents that when he watched the child sexual abuse material contained within the MEGA links, he copied the link from his iPhone 11 Pro cellular telephone and pasted the link to his computer. HADDAD told the agents he did not download child sexual abuse material to his computer, and no child sexual abuse material should be found on his devices. The link that was being used to view child pornography at the time of the execution of the search warrant contained 181 different videos.
6. HADDAD admitted accessing child sexual abuse material by joining links to virtual Zoom meetings where the child sexual abuse material was being live-streamed. HADDAD used the mobile messaging platforms Telegram and MeWe to find the Zoom meetings in which child sexual abuse material was shared. HADDAD explained that the links being broadcasted in the Zoom meetings usually came from the file sharing application MEGA.

7. Fourteen (14) items were seized pursuant to the search warrant and reviewed for child sexual abuse material. At least one device contained sexual material involving individuals whose ages were unable to be determined. The remainder of the devices either didn't contain contraband or were unable to be forensically examined.
8. Based on the aforementioned facts, your Affiant respectfully submits that there is probable cause to believe that on or about July 14, 2021, ZAID MASHHOUR HADDAD knowingly accessed with intent to view, any material that contained an image of child pornography, as defined in Title 18 United States Code Section 2256(8)(A), that has been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FURTHER AFFIANT SAYETH NOT,

**MACKENZIE
FERGUSON**
Mackenzie D. Ferguson
Special Agent
Federal Bureau of Investigation


Digitally signed by MACKENZIE FERGUSON
Date: 2025.04.28 13:17:24 -05'00'

Sworn to telephonically and signed electronically on April 29th, 2025.


RICHARD B. FARRER
UNITED STATES MAGISTRATE JUDGE